

IN THE UNITED STATES BANKRUPTCY COURT  
District of Puerto Rico

In the Matter of:

JUAN OMAR ALVAREZ BERRIOS  
AILYN YADIRA ROSARIO RESTO

Debtor(s)

Case No. 13-05014 MCF  
Chapter 13

**MOTION TO AMEND SCHEDULES I, J, SOFA AND PLAN**

**TO THE HONORABLE COURT:**

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. Schedule I contained incorrect information about debtor's income, but after considering claims by Fondo del Seguro del Estado and potential claims by IRS and Departamento de Hacienda, debtors' budget was insufficient to pay these priorities. Debtor Alvarez works a 20 hours schedule per week at L & F Station in Ciales at a rate of \$7.25 per hour. After he followed our suggestions he succeeded having an increased to 30 hours a week and his income will be \$942.00 a week with deductions of \$74.97.
2. Schedule I was amended to reflect that increase in salary and the prorated Christmas Bonus of \$600.00 expected by Joint debtor every year (itemized in Other Income). Schedule J was amended for minor adjustments in expenses.
3. Statement of Financial Affairs was amended to include information of business that closed operations in January 2012 and plan was amended to increase base with payments in two steps: two months of \$170.00 and 58 months of \$310.00 during 60 months.

**NOTICE**

TAKE NOTICE that within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted or decided without actual hearing unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public

policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the informed above and confirm plan dated August 7, 2013.

**CERTIFICATE OF SERVICE**

I CERTIFY that a copy of this motion has been filed with the Clerk of the Court that will send notice to the Chapter 13 trustee José R. Carrión Morales and all parties subscribed to the CM/ECF system. All other non participants have been notified on this date with a copy of the motion regular mail using the US Regular Postal Service, as per Master Address List attached.

In Vega Baja, Puerto Rico, this day August 8, 2013

s/ Juan O. Calderon Lithgow  
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